

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARIA MARGHERITA PERACCHINO and  
MEDIAPRESS S.R.L.,

Plaintiff,

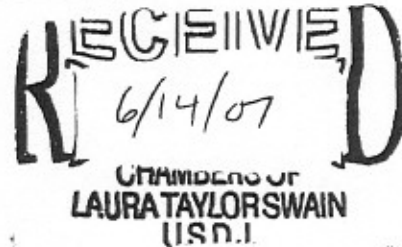
-against-

VINCENZO MARRA and  
JOHN DOE COMPANY,

Defendants.

Civ. Action No.  
07 Civ. 3257 (LTS)

STIPULATION



IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for the respective parties that:

(1) The Defendants' time to move or answer with respect to the Complaint is hereby extended to July 17, 2007;

(2) In the event the Defendants move to dismiss the Complaint, plaintiffs shall serve opposition papers to Defendants' motion to dismiss on or before August 16, 2007;

(3) Defendants shall serve reply papers on or before September 12, 2007; and

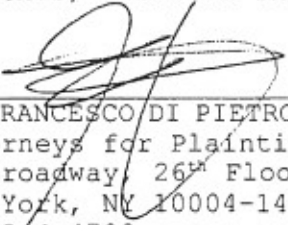
(4) The parties shall cooperate with a request to the Court to adjourn the Scheduling Order Conference now set by the Court for

Exhibit C


August 22, 2007, to a date convenient for the Court.

Dated: New York, New York  
June 11, 2007

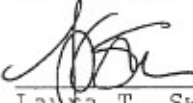
DeORCHIS, WIENER & PARTNERS, LLP

By:   
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New York, NY 10004-1480  
212-344-4700  
File No.: 2372-001

KAYSER & REDFERN, LLP

By:   
LEO KAYSER, III (LK 3550)  
Attorneys for Defendants  
515 Madison Avenue, 30<sup>th</sup> Fl.  
New York, NY 10022  
212-935-5057

SO ORDERED

 6/15/07  
Laura T. Swain, U.S.D.J.

**KAYSER & REDFERN LLP**

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July 9, 2007

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Re: Maria M. Peracchino and MediaPress  
v. Vincenzo Marra and John Doe Company  
Civ Action No.: 07 Civ. 3257 (LTS)  
Your File No.: 2372-001

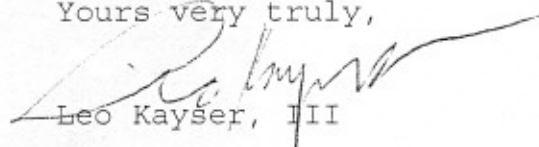
Dear Mr. DiPietro

Judge Schwain's rules require counsel "prior to making a motion of any type" to "use their best efforts to resolve informally the matters in controversy". Defendants are of the opinion that none of the ten counts in the Amended Complaint state a claim upon which relief can be granted. I am prepared to discuss each of the ten counts by telephone at your convenience to explain why each fails to state a claim.

Furthermore, it is apparent to me from the pleading, that this case should have been brought in Italy and certainly not in New York. We are prepared to stipulate to Plaintiffs' voluntary dismissal of the case in exchange for defendants' agreement to be subject to service in Italy.

If we can reach agreement on the above, we will avoid needless motion practice before Judge Schwain.

Yours very truly,

  
Leo Kayser, III

LK:dm  
cc: Vincent Marra

Exhibit D